1 The Honorable John C. Coughenour 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 JORDAN KASTEL and STORMIE HOY, Case No: 2:23-cv-00684-JCC Individually and for Others Similarly Situated, 10 Plaintiffs, 11 STIPULATED MOTION AND VS. [PROPOSED] ORDER FOR EXTENSION 12 OF TIME TO FILE MOTION FOR CASCADE LIVING GROUP PRELIMINARY APPROVAL MANAGEMENT, LLC, a Washington limited 13 liability company, **NOTED FOR HEARING: JUNE 18, 2024** Defendant. 14 15 Pursuant to Loal Rules 7(d)(1) and 10(g), Plaintiffs and Defendant jointly move for an extension 16 of time to file the Motion for Preliminary Approval. The Parties stipulate to and request an extension 17 to three (3) weeks after the current deadline from, June 18, 2024, until Friday, July 12, 2024. 18 The Parties filed a Joint Notice of Class and Collective Action Settlement on April 19, 2024. 19 See ECF No. 25. That notice indicated "Plaintiff anticipate[d] filing a motion for preliminary approval, 20 together with supporting documentation, within sixty calendar days," i.e., by June 18, 2024. 21 This is the first request for an extension of time for the deadline to move for preliminary 22 approval of the settlement. 23 The parties have made substantial progress toward finalizing the settlement agreement, class 24 notice, and FLSA opt-in claim form. 25 26 27 28 JOSEPHSON DUNLAP LLP FRANK FREED SUBIT & THOMAS LLP STIPULATED MOTION FOR

1 The parties have conferred and agree to request a modest extension of time to submit the 2 motion for preliminary approval and supporting documents, and agree that July 12, 2024 is a 3 reasonable accommodation to allow the Parties to finalize the relevant materials. 4 No other dates or deadlines would be altered by this proposed extension of time. 5 Respectfully and jointly submitted on June 18, 2024 by: 6 /s/ William M. Hogg /s/ Erin M. Wilson (w/ permission) Michael A. Josephson (Pro Hac Vice) Erin M. Wilson, WSBA # 42454 7 Andrew W. Dunlap (Pro Hac Vice) Taylor Washburn, WSBA # 51524 William M. Hogg (Pro Hac Vice) LANE POWELL PC 8 JOSEPHSON DUNLAP LLP 1420 Fifth Avenue, Suite 4200 11 Greenway Plaza, Suite 3050 9 P.O. Box 91302 Houston, Texas 77046 Seattle, Washington 98111 Tel: (713) 352-1100 10 Telephone: (206) 223-7000 mjosephson@mybackwages.com Facsimile: (206) 223-7107 adunlap@mybackwages.com 11 whogg@mybackwages.com wilsonem@lanepowell.com washburnt@lanepowell.com 12 Michael C. Subit, WSBA # 29189 FRANK FREED SUBIT & THOMAS LLP Counsel for Defendant 13 705 Second Avenue, Suite 1200 Seattle, Washington 98104 14 Tel: (206) 682-6411 msubit@frankfreed.com 15 Richard J. (Rex) Burch* 16 **BRUCKNER BURCH PLLC** 11 Greenway Plaza, Suite 3025 17 Houston, Texas 77046 Tel: (713) 877-8788 18 rburch@brucknerburch.com 19 William C. (Clif) Alexander (*Pro Hac Vice*) Austin W. Anderson (Pro Hac Vice) 20 Carter T. Hastings (Pro Hac Vice) ANDERSON ALEXANDER PLLC 21 101 N. Shoreline Blvd., Ste. 610 Corpus Christi, Texas 78401 22 Tel: (361) 452-1279 clif@a2xlaw.com 23 austin@a2xlaw.com carter@a2xlaw.com 24 * - Pro hac vice application forthcoming 25 Attorneys for Plaintiff, Class, and Collective 26 Members 27 28

[PROPOSED] ORDER

IT IS SO ORDERED.

Plaintiffs shall file their Motion for Preliminary Approval no later than July 12, 2024.

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Dated: <u>June 18</u>, 2024.

THE HONORABLE JOHN C. COUGHENOUR United States District Court Judge